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February 27, 2019

VIA EMAIL

Honorable Douglas E. Arpert
United States Magistrate Judge
United States District Court, District of New Jersey
Clarkson S. Fisher Building and U.S. Courthouse
402 East State Street, Courtroom 6W
Trenton, NJ 08608

**Re: Agudath Israel of America, et al. v. Township of Jackson, New Jersey
Case No. 3-17-CV-03226**

Dear Judge Arpert:

The undersigned represents the Plaintiff, Agudath Israel of America, and is co-counsel for Plaintiff, WR Property LLC, in the above referenced matter. The Complaint was filed on May 8, 2017 and subsequently amended on November 15, 2017. The parties were referred to mediation with the Honorable Alexander Carver and agreed to engage in the joint preparation of Ordinances or remedial legislation to address the issues in dispute. For well over a year, the parties and their planners have attended many meetings in an effort to finalize this remedial legislation. When the parties were unable to reach agreement as to the form of Ordinances this past Summer, Your Honor brought the parties in for a Settlement Conference on July 26, 2018.

Following the Settlement Conference, Plaintiffs continued to, in good faith, negotiate the form of the Ordinances. Reports were made to the Court that the parties were close to concluding negotiations. In December 2018, the parties finalized the remedial legislation in the form of two draft Ordinances. Both parties represented that they were satisfied with same and the Ordinances were to be placed on the Agenda for the Township of Jackson after January 1, 2019 with a timetable to have adoption concluded by February 2019.

The Ordinances have yet to be placed on the Township's Agenda and Plaintiffs, upon information and belief, contend that this is due to the fact that the Council will not support them. Plaintiffs specifically requested that the Ordinances be placed on the Agenda for the Township's

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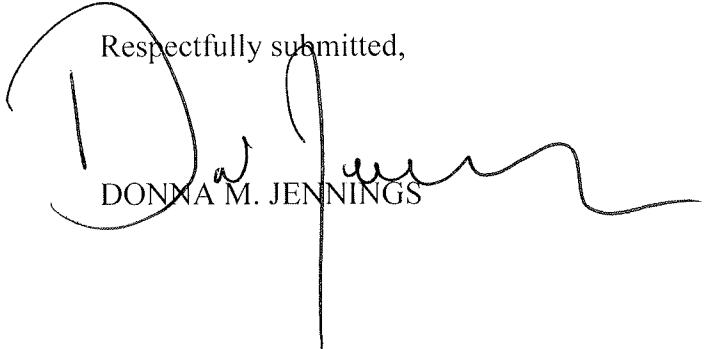
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February 13, 2019 meeting. In response, Plaintiffs have been advised that the Township now wants to modify the negotiated remedial legislation and the Ordinances were not placed on the Agenda for that meeting nor were they considered at the Township's meeting of February 26, 2019.

This disappointing series of events have led the Plaintiffs to not believe that Defendant, Township of Jackson, is acting in good faith at this juncture and that the entire last year of negotiation has been in bad faith and used to delay the resolution of Plaintiffs' claims. Plaintiffs are requesting an in-person status and scheduling conference with the Court at which time the Court can prepare the appropriate Order to move this case forward.

Thank you for your attention to this matter.

Respectfully submitted,


DONNA M. JENNINGS

DMJ:mb

cc: via email:
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Pauline F. Tutelo, Esq.
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